

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Ash-har Quraishi, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 16-cv-1320
)	
St. Charles County, Missouri, et al.,)	
)	
Defendants.)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE MEMORANDUM IN
OPPOSITION TO COUNTY DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT IN EXCESS OF FIFTEEN PAGES**

Plaintiffs Ash-har Quraishi, Marla Cichowski and Sam Winslade move this Court to permit them to file a memorandum in opposition to the County Defendants' motion for summary judgment that exceeds the otherwise allowable page limit by 12 pages. In support of their motion, Plaintiffs state as follows:

1. Pursuant to E.D.Mo. L.R. 7-4.01(D), Plaintiffs' memorandum in opposition to the County Defendants' motion for summary judgment is not to exceed fifteen pages, exclusive of the signature page and attachments, unless leave of court is granted.

2. In support of their motion for summary judgment, the County Defendants proffered 85 purported uncontroverted facts. Pursuant to E.D.Mo. L.R. 7-4.01(E), Plaintiffs have responded to each of these alleged uncontroverted facts in a separate response. However, Plaintiffs also believe it would be extremely beneficial to the Court for the Plaintiffs to be able to recite a summary of the facts in their memorandum.

3. In addition, Plaintiffs' Complaint asserts eight separate counts against the County Defendants, and the County Defendants seek summary judgment as to each

count. As a result, it is necessary for Plaintiffs to address each count, and each defendant, in their memorandum.

4. It is not possible for Plaintiffs to accomplish both of these objectives in the allowable 15-pages.

5. Accordingly, Plaintiffs hereby request leave to file a 27-page memorandum in opposition to County Defendants' motion for summary judgment.

WHEREFORE, Plaintiffs request the entry of an order granting this motion for leave to file a memorandum in opposition in excess of the page limit.

Respectfully submitted,

LATHROP GAGE LLP

By: /s/Bernard J. Rhodes

Bernard J. Rhodes (EDMO #550712)
2345 Grand Blvd., Ste. 2400
Kansas City, MO 64108
(816) 292-2000 – Telephone
(816) 292-2001 – Facsimile
brhodes@lathropgage.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that a copy of the above was filed on September 12, 2017, using the Court's ECF/CM filing system, which will send notice to the following counsel of record:

Holly E. Ragan
Beverly E. Temple
Rory P. O'Sullivan
Office of the St. Charles County Counselor
100 N. 3rd St., Ste. 216
St. Charles, MO 63301
hragan@sccmo.org
btemple@sccmo.org
rosullivan@sccmo.org

/s/Bernard J. Rhodes
An Attorney for Plaintiffs